

From: Breean Walas <breean@walaslawfirm.com>
Sent: Wednesday, February 12, 2020 3:49 PM
To: Ian McIntosh
Cc: Mac Morris
Subject: RE: Meyer v Big Sky - Evi Dixon Subpoena Response
Attachments: E. Dixon - Subpoena Response (2.12.20).pdf

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Ian

Attached are full size screenshots of the previously produced text messages and Facebook messages.

With respect to the photograph contained in one of the text messages, and the reference to "one of many," Ms. Dixon has advised that the photographs were taken by a friend who is not a current or former Big Sky employee. As such, and since those photographs were not included in any correspondence with Mr. Meyer or anyone acting on his behalf, they do not fall within the topics requested by the subpoena. In good faith, I did request that Ms. Dixon provide those pictures; however, she has advised that she deleted the photographs after she reviewed them. She also does not have the photo that was included in the email in Jpeg format. Therefore, Plaintiff cannot produce those photographs at this time.

Please let me know if you have any difficulty with the attached file.

Breean Walas
Walas Law Firm

From: Ian McIntosh <imcintosh@crowleyfleck.com>
Sent: Friday, February 7, 2020 15:49
To: Breean Walas <breean@walaslawfirm.com>
Cc: Mac Morris <wmorris@crowleyfleck.com>
Subject: RE: Meyer v Big Sky - Evi Dixon Subpoena Response

Thank you.

IAN MCINTOSH
1915 South 19th Avenue
Bozeman, MT 59718
Main: 406.556.1430 | Fax: 406.556.1433
Direct: 406.522.4521



WITH OFFICES IN MONTANA, NORTH DAKOTA, AND WYOMING:
BILLINGS BISMARCK BOZEMAN BUTTE CASPER CHEYENNE HELENA KALISPELL MISSOULA SHERIDAN WILLISTON

EXHIBIT 9

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From: Breean Walas <breean@walaslawfirm.com>
Sent: Friday, February 7, 2020 3:36 PM
To: Ian McIntosh <imcintosh@crowleyfleck.com>
Cc: Mac Morris <wmorris@crowleyfleck.com>
Subject: RE: Meyer v Big Sky - Evi Dixon Subpoena Response

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I will follow-up with Ms. Dixon on these matters.

Breean Walas
Walas Law Firm

From: Ian McIntosh <imcintosh@crowleyfleck.com>
Sent: Friday, February 7, 2020 14:30
To: Breean Walas <breean@walaslawfirm.com>
Cc: Mac Morris <wmorris@crowleyfleck.com>
Subject: RE: Meyer v Big Sky - Evi Dixon Subpoena Response

Breean –

Thank you for providing these documents that should have been produced by Ms. Dixon previously. On page 50 of the pdf you sent to us, Ms. Dixon sends a photo of the loop road to Mr. Meyer. That photograph definitely should have been produced in response to the subpoena and we should have been given the opportunity to question Ms. Dixon about the photo. Ms. Dixon also states that the photo is one of many.

Please produce all of the photographs as jpegs and please produce Ms. Dixon's correspondence with the person that provided the photographs to her.

We also need clearer pictures of the text messages between Ms. Dixon and Mr. Meyer.

Thank you and please let me know if you have any questions.

IAN MCINTOSH
1915 South 19th Avenue
Bozeman, MT 59718
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From: Breean Walas <breean@walaslawfirm.com>
Sent: Friday, February 7, 2020 1:33 PM
To: Ian McIntosh <imcintosh@crowleyfleck.com>
Cc: Mac Morris <wmorris@crowleyfleck.com>
Subject: Meyer v Big Sky - Evi Dixon Subpoena Response

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Ian

Attached please find documents in Ms. Dixon's possession that are responsive to your subpoena, which was also attached as Exhibit 70 to Ms. Dixon's deposition. I have also included the correspondence between Ms. Dixon and myself regarding this matter, as well as a copy of Mr. Meyer's December 11 letter responding to the subpoena and Ms. Dixon's expert witness contract.

Regards,

Breean Walas
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Bozeman, MT 59772
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Fax: (501) 421-9693
Email: breean@walaslawfirm.com